

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: LARRY PAUL OSBORNE, II

**CASE NO.: 19-10879-JDW
CHAPTER: 13**

RESPONSE TO DEBTOR'S MOTION FOR PERMISSION TO SELL REAL PROPERTY

COMES NOW, Wells Fargo Bank, N.A. ("Wells Fargo"), by and through its attorney, and files this response to the Debtor's Motion to Sell Property Free and Clear of Liens [doc. #46], and respectfully submits the following:

1. Wells Fargo is a secured creditor in the above numbered cause of action by virtue of its holding a Note secured by a Deed of Trust affecting property of the Debtor located at 667 Timber Lane E., Hernando Mississippi. The Note and Deed of Trust are payable in monthly installments and the property affected by the mortgage is the primary residence of the Debtor.

2. Debtor's Motion to Sell [doc. #46] proposes to sell the above listed property for a purchase price of \$179,675.00, which would thereby pay Wells Fargo's mortgage lien in full.

3. Wells Fargo requests that the ongoing monthly mortgage payments are maintained by Debtor before the sale takes place.

4. Wells Fargo requests that the sale to be completed and funds received within ninety (90) days from an Order entered resolving this matter.

5. For other good and valid reasons to be shown at the hearing of the Motion to Sell Property.

WHEREFORE, Wells Fargo seeks confirmation that the proposed sales price will be sufficient to satisfy the indebtedness due Wells Fargo in full; that the Wells Fargo indebtedness will be paid in full subject to a proper payoff quote issued directly by Wells Fargo, and

calculated through a verified closing date; that the sale proceeds will be first applied to the Wells Fargo; or that any sale short of full payoff will be subject to Wells Fargo's final approval.

Respectfully submitted, this the 26th day of March, 2020.

Dean Morris, LLC
Attorneys at Law
1820 Avenue of America
Monroe, Louisiana 71201
(318) 330-9020

/s/ Kimberly D. Putnam
Kimberly D. Putnam (Bar #102418)
Attorney For Wells Fargo Bank, N.A.

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CERTIFICATE OF SERVICE

I, Kimberly D. Mackey, hereby certify that I have notified the following interested parties of the Response to Debtor's Motion Sell Real Property filed by Wells Fargo Bank, N.A., who are listed as followed:

Robert H. Lomenick, Jr.
Attorney at Law
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Locke D. Barkley
Trustee
sbeasley@barkley13.com

U.S. Trustee
USTPRegion05.AB.ECF@usdoj.gov

By electronic transmission or by mailing this notice and a copy of said filed herein by United States Mail, first class, postage prepaid and properly addressed, all on this 26th day of March, 2020.

Dean Morris, LLC
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1820 Avenue of America
Monroe, Louisiana 71201
(318) 330-9020

/s/ Kimberly D. Putnam
Kimberly D. Putnam (Bar #102418)
Attorney For Wells Fargo Bank, N.A.